

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
The Use of N11 Codes and Other	)	CC Docket No. 92-105
Abbreviated Dialing Arrangements	)	

**REPLY COMMENTS OF THE NORTH CAROLINA DEPARTMENT OF  
TRANSPORTATION**

The North Carolina Department of Transportation hereby submits its Reply Comments to the Comments filed to refresh the record regarding reconsideration of the Commission's designation of the 211 and 511 abbreviated dialing codes.

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I      511 Implementation Status

The North Carolina Department of Transportation began its development of the NC 511 system in July of 2002. Our goal was to develop a comprehensive system that would address the needs of all of our transportation users as well as address the guidelines set forth by the 511 Coalition. After much research on how to best deploy our system, we partnered with the National 511 Alliance to design, build, and operate the NC 511 system. The NC 511 system, which was launched on August 25, 2004, is the single best source of multi-modal transportation information for the state.

The statewide system provides the caller with information about unusual delays on NC's Interstates and major highways, whether it is from construction and maintenance activities, accidents, or weather impacts. The system also allows the caller to access the North Carolina Department of Transportation's Division of

Rails, Division of Ferry's, NCDOT's Customer Service, NC Tourism and Transit agencies in the Triad region only (Winston Salem Transit Authority (WSTA), Greensboro Transit Authority (GTA), High Point Transit (HITRAN), Guilford County Transit, and the Piedmont Authority for Regional Transportation (PART)). If the caller requests one of the previous entities, the NC 511 system transfers the call to these various agencies. Prior to the call being transferred, the system will inform the caller of the hours of operation of these agencies and provide them with the phone number. The NC 511 system will not transfer a call to one of these agencies unless it is during the hours of known operation of that entity. If the caller selects one of these agencies during non-business hours, then the NC 511 system will inform the caller that the agency they selected is currently closed and will again provide them the hours of operation and phone number. Other transit agencies all across the state will be added regionally in the upcoming years.

To address the boarder issue with Virginia and its 511 System, NCDOT and Virginia DOT (VDOT) agreed to transfer calls between systems as needed. Through two months of operation, the Virginia 511 system is the number one destination (at 30%) of all call transfers out of the NC 511 system. NCDOT is working with other bordering states currently planning 511 systems (i.e., Tennessee) to provide the same functionality, thus providing a more user-friendly service to the traveling public and eliminating the need to handle overly complex telecommunication issues with every carrier in and around North Carolina.

A caller to the NC 511 system is also be able to receive the phone numbers to the NC Division of Motor Vehicles (NCDMV) and the Great Smoky Mountains National Park. Currently, a direct transfer at this time is not available to these agencies.

The system is a voice activated system that has the capability to handle up to 168 calls at one time; 72 callers will be able to access the system and 96 callers will be placed into a queuing system. The callers in the queuing system can access all information with the exception of highway information. If the caller wants highway information, they will have to hold the line until a port opens up in the main system.

The NC 511 system has the capability to broadcast a “Floodgate Message” to the caller. The floodgate message will convey information that has a significant statewide impact. If the floodgate message is activated, all callers into the NC 511 system must listen to the message. Other capabilities of the NC 511 system include call persistence and call interruption. Call persistence is the ability of the NC 511 system to recognize that a caller has just called into the system within the last two minutes. If a caller has been dropped from the system, whether by their choice or by losing a signal on their cell phone, the system recognizes that they recently called and asks the caller if they want to be inserted back into the menu where they just left off. If the caller says “No”, it puts the caller back into the main menu. Call interruption is a feature that callers who are savvy with the NC

511 system are able to navigate through the menu without having to hear all choices. If a caller uses the system frequently, then they become familiar with the path they need to speak to get to the information they would like to hear. A caller can also leave feedback on their experience with the NC 511 system. This allows NCDOT to continually monitor the system and ensures that the NC 511 system remains customer-centric; meeting the callers' needs.

➤ Statistics:

- o Roads covered - 147
- o Segments covered - 366
- o Number of Calls:

August	31,153
September	154,840
October	<u>69,569</u>
<b>Total</b>	<b>255,562</b>

- o Average Call Length: 1 min 43 sec
- o Peak Days:
  - 16,961 calls on 9/3/04 - Combined Effects of Labor Day, AMBER Alert and Pending Landfall of Hurricane Gaston
  - 13,214 calls on 9/8/04 – Hurricane Frances
  - 10,916 calls on 9/17/04 – Hurricane Ivan
- o Call Distribution:
  - Wireless (44%)
  - Landline (46%)

- o Calls from:
  - 50 States
  - 3 Provinces
  - Puerto Rico
- o Top transfers to:
  - VA 511 (30%)
  - NCDOT Customer Service Line (27%)
- o Highest calls per day occur on Fridays
- o Highest calls per hour occur during the 5:00 PM hour
- o Two main feedback comments to the system:
  - Lack of roadway data when the caller knows from other sources that there is a delay
  - Hard to find weather data.
- o Improvements/Expansions:
  - Expand to include all Transit Agencies
  - Make system bi-lingual (Spanish)
  - Access direct feed from State Highway Patrol (SHP) for their dispatch data to enhance the NC 511 system.
  - Add additional partners to system, ie – SHP, Blue Ridge Parkway, other states, etc.
  - Make weather easier to find in menu.
  - Make system easier to use for 711 services.

## II Carrier Interaction

All requests made to wireless and landline carriers for translation to the NC 511 system were made by the NCDOT. Prior to the system design of the NC 511 system, the NCDOT invited all landline and wireless carriers to attend an open meeting with NCDOT staff to discuss the best way to implement the system from the carrier perspective. All carriers at this meeting affirmed that it would be easier on them to translate to one statewide number. NCDOT did have to prepare a petition to the North Carolina Utilities Commission (NCUC) to request that the NCDOT be the sole source for the 511 number in NC. Carriers in NC provided comments to the petition and NCDOT responded to those comments. NCDOT was awarded the “ownership” of the 511 number in NC. Taking heed from the carriers in the state, the NCDOT did implement a nationwide toll-free number for its backdoor translation number, thus making the translation easier for the carriers serving NC. The NCDOT also stated that it would pay any cost associated with the initial translation that any carrier incurred due to the work required in routing of the calls.

Impacts to wireless providers were minimal in NC. The NCDOT requested that all routing be done at the highest level, thus eliminating any tower-level programming. Issues did arise for call routing to adjacent states, however, NCDOT decided to maintain the routing at the highest possible level and address this problem in our menu tree. Currently, the only state that borders NC that is offering 511 is Virginia. In locations where wireless coverage

areas bleed over into Virginia, NCDOT offers a transfer to the Virginia 511 system to accommodate callers that may have been trying to access the VA 511 system initially.

### III Conclusion

The North Carolina 511 system provides an excellent service to our transportation users in NC. We strive to meet the needs of all modes of transportation and to improve our service to meet the needs of those users.

The NCDOT is committed to continually analyzing feedback from our system and are dedicated to incorporating those concerns into the system. We, as a public service, see the need to offer timely and accurate information to our transportation users and are committed both with our financing of the system and by providing continual analysis of the system. To date, the North Carolina Department of Transportation has not experienced the issues identified by the Petitioners in our state, thus we do not support additional rulemaking at this time.